

Before the  
**FEDERAL COMMUNICATIONS COMMISSION**  
Washington, D.C. 20554

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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF SECRETARY

In the Matter of

Closed Captioning Requirements  
for Computer Systems Used as  
Television Receivers

RM-8785

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To: The Commission - Mail Stop 1170

**COMMENTS OF THE PUBLIC BROADCASTING SERVICE**

1. Introduction. The Public Broadcasting Service ("PBS") hereby supports the above-captioned Petition for Rule Making ("Petition"), filed on December 22, 1995, by the National Association of the Deaf *et al.* ("NAD"). PBS is a non-profit membership organization, the members of which are the licensees of virtually all of the nation's public television stations. PBS provides program distribution and other services to its members. PBS has long been at the forefront in the development of captioning technology and services. The first nationally broadcast captioned program was distributed by PBS. PBS was also the petitioner for rule making in the proceeding that led to the reservation of line 21 of the NTSC vertical blanking interval for closed captioning services in 1976. Its engineers took a leading role from the start in the development and enhancement of closed-captioning technology.

2. The Commission is being asked to take an important step in furtherance of the purpose of the Television Decoder Circuitry Act of 1990 ("TDCA").<sup>1/</sup> In passing that statute, Congress expressed a clear intent that the vast majority of devices through which television

<sup>1/</sup> 47 USC §§303(u), 330(b).

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programs are viewed be capable of displaying closed captions and that deaf and hard-of-hearing persons be able to enjoy the benefits of television service without having to purchase special add-on equipment or to seek out special television receiver models. In large part as a result of the statute, closed-captioning is widely available today and has rightly become an integral part of television. It is a second form of the audio channel and no longer is or should be considered a separate "service" apart from the program.

3. The Commission has an important responsibility to ensure that the intent of Congress continue to be fulfilled in both today's and tomorrow's rapidly changing technological environments. Two key changes are now visible on the horizon and are not likely to be far away in time. One is the convergence of television and computer visual display technologies. A common device will soon serve to display both video entertainment and information programming and the output of computer CPU's and online services. Accompanying this convergence will be the breakdown of both television receivers and computers into separately sold component parts. Computer monitors are already sold separately from computers; and the video display section of television receivers may soon be separated from the tuner and demodulating circuits, just as audio components such as CD players and amplifiers are often sold separately today.

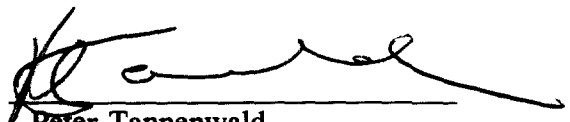
4. With these changes on the near-term horizon, it should be apparent to the Commission that interpreting the TDCA to apply only to an integrated device that receives and demodulates television signals, displays video, and make sound all-in-one will ultimately defeat the basic intent of Congress to have closed-caption display capability be an integral part of virtually all devices normally used by consumers to view television programs. Now is the time

for the Commission to address these issues, and to develop up-to-date interpretations of the statute, before foreseeable changes are actually upon us and there is still time to influence future equipment design.

5. Accordingly, PBS urges the Commission to issue a Notice of Proposed Rule Making promptly to consider the issues raised by NAD and to determine what rule changes are necessary to ensure that the significant progress made under the TDCA continues rather than being reversed.

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Respectfully submitted,



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April 29, 1996

**CERTIFICATE OF SERVICE**

I, Laura Ann Campbell, hereby do certify, that on this 29th day of April, 1996, a copy of the foregoing "Comments of the Public Broadcasting Service" has been served by first-class United States mail, postage pre-paid, upon the following:

Karen Peltz Strauss, Esquire  
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*Laura Ann Campbell*